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EX PARTE OR LATE FILED



March 3, 1998

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: CC Docket 96-128, Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996**

Dear Ms. Salas:

Bell Atlantic is filing this ex parte to provide status on several technical issues related to the requirement that the network transmit unique, payphone-specific coding digits on all payphone telephone lines by March 9, 1998.

As stated in its January 12, 1998 letter, Bell Atlantic expected to have 100% of its payphone service provider (PSP) lines equipped to deliver payphone-specific coding digits by March 9. However, over the last few weeks: a new technical problem was identified by another LEC; expected vendor patches to address previously identified problems have been delayed; and one patch received late last week failed to operate properly and has been returned to the vendor for further development. The net effect of these recent developments is that Bell Atlantic is unable to complete Flex ANI conditioning on 1.3% of its PSP lines by the March 9, 1998 waiver deadline. Some types of calls from certain vendor switches also will not properly transmit the Flex ANI digits associated with the PSP line. Each of these technical problems is explained more fully below. Bell Atlantic expects to be able to correct all but one of these problems by May 9, 1998 and the remaining problem with a Nortel switch generic in July, 1998, and it requests an extension of its existing waiver to permit it to do so.

To date, only one major interexchange carrier has conducted technical testing of the Flex ANI feature with Bell Atlantic. Many of the Flex ANI technical issues were identified by running these technical test scripts. Other Flex ANI problems have been brought to Bell Atlantic's attention as a result of the intense industry effort to coordinate Flex ANI implementation nationwide in the time permitted by the Commission. Even through the Flex ANI feature was developed over a decade ago and is available in most

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switches used by Bell Atlantic, it has never been activated for widespread deployment and, unless and until more interexchange carriers test or order the feature, Bell Atlantic cannot be certain that all technical problems have even been identified.

Bell Atlantic previously advised the Commission, in our October 30, 1997 filing, that the industry had identified a limitation in Nortel's operator service platform (DMS 200 switches) that prevents Flex ANI information from being passed on calls delivered through 0- transfer service. Bell Atlantic stated at that time that it would require a waiver for this type of calls if a vendor fix could not be developed by March 9, 1998.

Last week, Nortel advised us that a fix for the 0- transfer problem would not be available until March 31, 1998. Upon receipt of the new software from Nortel, Bell Atlantic testing will take 2-3 weeks and then the software will be installed on all operator switches. We anticipate being capable of delivering Flex ANI payphone-specific digits on all 0- transfer calls no later than April 21, 1998.

The industry has determined that all Nortel switches have been designed to outpulse "00" ANI/Flex ANI digits on all toll free calls (800 and 888) based on a prior Nortel decision that these calls are free to the calling party and therefore no carrier would want or require the originating ANI for billing purposes. Bell Atlantic submitted requests for feature development to correct this problem in all Nortel DMS switches. Bell Atlantic is currently deploying a fix in all of its Nortel switches equipped with the most recent Nortel switch generics (i.e., 007 and 008). As of late yesterday, Nortel was still unable to advise Bell Atlantic if or when the problem would be corrected in the remaining DMS 100 switch generics (i.e., 004, 005 and 006). We expect a final decision from Nortel by the end of this week. Assuming Nortel agrees to timely development of a patch for these additional generics, Bell Atlantic believes it can have the problem fixed in all DMS100 switches no later than the end of April.

Last week, Nortel also advised Bell Atlantic that no software patch will be developed for the switches currently running on the BCS36 generic since this generic is manufacturer discontinued. Bell Atlantic has 14 of these switches and all are currently scheduled for software and hardware upgrades in July, 1998. Although the PSP lines in these switches have all been conditioned to deliver Flex ANI, the switch will not properly pass the digits until the upgrade is done in July. Approximately 1% of all PSP lines are served by these 14 switches.

Flex ANI issues were also previously identified in Siemens switches. Bell Atlantic purchased a feature to correct these problems and a patch was received last week. Bell Atlantic testing of the patch last Thursday night revealed that ANI was not being transmitted on 911 calls, which would make useless the advanced 911 services that rely on ANI. We received a revised software patch from Siemens today and are in the process of testing it. Once we have working software, Bell Atlantic can complete the PSP line conditioning to enable the 1.3% of our total payphone lines to be in compliance with the

Commission's rules. Assuming the latest version of the patch is trouble free, Bell Atlantic expects to have this Siemens issue resolved no later than the end of March.

Lastly, another LEC recently discovered a Flex ANI transmission problem effecting all 800/888 calls at tandem switches. The problem involves the inability of any tandem switch to selectively route ANI/Flex ANI digits to the appropriate interexchange carrier when the 800/888 database query is performed at the tandem. Our tandem switch vendors have told us it will be 1999 or 2000 before this problem can be corrected.

Today, in the New York and the New England areas of Bell Atlantic, all 888 queries are made at the tandem. Bell Atlantic can implement a partial solution to this problem by activating an existing feature of its Lucent end office switches that will permit the 888 queries to be done at the end office. Bell Atlantic expects to complete the end office conversion on its Lucent switches by the end of April. No near term economical solution exists for its remaining 888 tandem traffic. Bell Atlantic expects that some small portion of toll free queries will continue to be processed at the tandem level based on CLEC agreements but Bell Atlantic cannot estimate the payphone call volumes that will be generated on CLEC lines. Bell Atlantic will continue to work with its vendor to correct this problem.

Bell Atlantic believes that it is important for the Commission to know, in the context of weighing a request for waiver of the technical issues discussed above, the interexchange carrier demand (or lack thereof) for this feature. To date, Bell Atlantic has orders for Flex ANI deployment for payphone per-call compensation from 3 small to mid-sized interexchange carriers (none of whom are the "big 3"). As stated in Bell Atlantic's 'All Users of Access' letter sent December 17, 1997, the first carrier to request Flex ANI in each central office must negotiate a due date with Bell Atlantic and all subsequent requests for the same central office to be completed on a 30 day interval.

Bell Atlantic is currently negotiating implementation dates with the 3 smaller carriers who have ordered Flex ANI, some or all of whom seem to be dependent on larger carriers to handle their operator traffic. Of significant note is that late last week, AT&T advised Bell Atlantic that, although it was now ready *to submit orders*, personnel at corporate headquarters had halted this activity based on issues pending with other LECs.

Bell Atlantic has, and will continue, its aggressive efforts to fully comply with the Commission's payphone coding digit requirements but it requires an extension of its existing waiver to permit it to do so.

Please call me if you have any questions regarding this information.

Sincerely,



cc: R. Crellin